

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**Shamika Whitfield;  
Plaintiff,**

**V.**

**City of Fort Worth  
Defendant.**

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**CIVIL ACTION NO.**

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**NOTICE OF REMOVAL**

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Defendant hereby gives notice pursuant to 28 U.S.C. § 1446 that the above-styled action, filed in the 153rd Judicial District Court of Tarrant County, Texas, Cause Number 153-325307-21, is removed to the United States District Court for the Northern District of Texas, Fort Worth Division. The following grounds support removal in this action:

1. The district courts of the United States have original jurisdiction over this action because Plaintiff's claims arise under federal law. Plaintiff has sued Defendant for allegedly violating the Due Process Clause of the 4<sup>th</sup> and 14<sup>th</sup> Amendments to the U.S. Constitution. [See page 3 of Plaintiff's Original Petition]. Therefore, this Court has original jurisdiction over Plaintiff's claims pursuant to 28 U.S.C. §§ 1331 and 1367; and, this action is removable pursuant to 28 U.S.C. § 1441(a).
2. On May 17, 2021, Plaintiff filed her Original Petition, which cited a federal cause of action. Defendant City of Fort Worth was served with a copy of Plaintiff's Original Petition on May 24, 2021. This Notice of Removal is

- therefore timely filed because it has been less than 30 days since the City was served.
3. Pursuant to the provisions of 28 U.S.C. § 1446(a), accompanying this Notice is a copy of all the process, pleadings, and orders served upon Defendant in this action.
  4. Pursuant to Local Rule 81.1, this Notice of Removal is also accompanied by a completed Civil Cover Sheet, a Supplemental Civil Cover Sheet, an index of all documents filed in state court, a copy of the docket sheet in the state court action, each document filed in the state court action, and a Certificate of Interested Persons in compliance with Local Rule 3.2(e).

Respectfully submitted,

s/ Lynn M. Winter

**Lynn M. Winter**

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CITY OF FORT WORTH

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